

**FEDERAL PUBLIC DEFENDER  
DISTRICT OF NEW JERSEY**

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Hon. Cathy L. Waldor  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

December 29, 2020

Re: *United States v. Maria Sue Bell*, Case No. 2:20-mj-9451-CLW

Dear Judge Waldor:

Maria Sue Bell, through undersigned counsel, respectfully applies for an extension of time to file a brief appealing Your Honor's oral Order denying Ms. Bell's Motion for Bond on December 21, 2020. ECF No. 12; *see* D.N.J. Civ. R. 6.1; D.N.J. Crim. R. 1.1 (incorporating relevant civil rules). Under a strict reading of the Local Rules, counsel only has until January 4, 2021, to file such a brief. *See* D.N.J. Civ. R. 72.1(c)(1)(A). King Transcription Services has requested audio of the relevant hearings and will let counsel know when the audio has been obtained and transcribed. This transcription will be necessary to review before appealing. Thus, counsel respectfully asks for an extension of time until 14 days after undersigned counsel receives the transcription to file a brief. If this application is acceptable to the Court, a proposed Order is below.

Respectfully submitted,

/s/ Rahul Sharma, AFD  
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SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
Hon. Cathy L. Waldor  
U.S. Magistrate Judge